



**MURIEL GOODE-TRUFANT**  
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**THE CITY OF NEW YORK**  
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January 15, 2025

**VIA ECF**

Honorable Joseph A. Marutollo  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Raffique Khan v. City of New York, et. al.*  
24 CV 2168 (ARR) (JAM)

Your Honor:

I am Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, one of the attorneys for Defendants City of New York, Mayor Eric L. Adams, Commissioner Edward A. Caban, Deputy Commissioner Michael Gerber, Police Officer Matthew S. Bessen, and former Officer Joseph Astarita (“Defendants”) in the above-referenced proceeding.<sup>1</sup> I write to provide the Court with a joint status report pursuant to Your Honor’s December 16, 2024 Order.

Parties continue to engage in non-*Monell* discovery. Consistent with Your Honor’s December 16, 2024 Order, Officer Matthew Bessen was deposed on January 13, 2025, and a deposition of Officer Joseph Astarita is scheduled for February 13, 2025. Defendants are working to resolve representation issues and schedule depositions of Sergeant Patrick Hughes and Officer Noah Nicholson before February 14, 2025. Parties have agreed upon timelines for serving and responding to additional discovery demands.

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<sup>1</sup> The City is still resolving representation for Officer Jeisen Jara, Officer Joseph Jacobsen, Sergeant Patrick Hughes, Officer Mohamed Eldiastry, Officer Thomas Costigan, and Officer Noah Nicholson.

Parties will follow the briefing schedule set forth in Your Honor's January 7, 2025 Order regarding Defendants' motion to dismiss.

Respectfully submitted,

/s/ Jessica Katzen

Jessica Katzen

Assistant Corporation Counsel

To: **VIA ECF**  
Todd Greenberg  
Jonathan Edelstein  
*Attorneys for Plaintiff*